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July 15, 2021

Project No. CF167-1906

Ms. Madi Novak  
Remedial Project Manager, Superfund and Emergency Management Division  
U.S. Environmental Protection Agency, Oregon Operations Office  
805 SW Broadway, Suite 500  
Portland, OR 97205-3331

Subject: **Q2 April 1–June 30, 2021 Quarterly Progress Report, Arkema Project Area  
Administrative Settlement Agreement and Order on Consent for Remedial  
Design at the River Mile 7 West Project Area  
U.S. EPA Region 10 CERCLA Docket No. 10-2020-0054**

Dear Ms. Novak:

On behalf of Legacy Site Services LLC (LSS), agent for Arkema Inc. (Arkema), this letter presents the quarterly progress report for work performed on the Arkema Project Area. This progress report is being submitted in accordance with Section 4.1 of Appendix A1, Arkema Statement of Work for the Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area (CERCLA Docket No. 10-2020-0054) entered into by Arkema and the U.S. Environmental Protection Agency (EPA) with an effective date of February 21, 2020.

- a) Actions that have been taken toward achieving compliance with the Settlement:
- On April 1, 2021, submitted to EPA a groundwater monitoring plan update, including groundwater filtering plans to obtain representative data from turbid sampling locations and to address method detection limit (MDL) and limit of quantitation (LOQ) requirements.
  - On April 7, 2021, received EPA comments on the April 1 groundwater filtration plan and MDL/LOQ plan.
  - On April 7, 2021, submitted the Q1 2021 quarterly progress report to EPA.

- On April 15, 2021, provided to EPA recommendations for lab filtration and alternate methods to achieve lower detection limits in response to EPA's April 7 comments.
  - Between March 15 and April 9, 2021, conducted site-wide groundwater sampling event. Weekly updates on the site-wide groundwater sampling events were provided to EPA on March 20, March 29, April 5, and April 10, 2021.
  - On June 17, 2021, received an email request from EPA regarding the electronic data deliverable (EDD) format. On June 18, 2021, LSS acknowledged by email that the EDD format could be met.
  - Access agreements for sampling on property owned by GS Roofing and Kinder Morgan were accepted and finalized. We are still awaiting final approval of the access agreement with BNSF Railway Company and the Oregon Department of State Lands.
  - Conducted preliminary work, including planning, coordination, clearing access to sample stations, and subcontracting in preparation for the Phase I riverbank sampling effort to take place in Q3 2021.
  - Prepared revisions to the Arkema quality assurance project plan (QAPP) to address EPA comments, update laboratory standard operating procedures, and make other related revisions for submittal to EPA in July 2021.
- b) List of all results of validated sampling, tests, and all other data received or generated by Respondent Arkema to comply with the Settlement:
- None.
- c) List of all deliverables that Respondent Arkema submitted to EPA:
- Draft Pre-design Investigation (PDI) Work Plan (dated June 18, 2020).
  - Revised PDI Work Plan (dated December 18, 2020).
  - Revised PDI Work Plan (dated March 10, 2021)
- d) List of all activities scheduled for the next quarter:
- Submit the revised PDI Work Plan QAPP to EPA in July.
  - Complete the Phase 1 riverbank soil sampling event in July.
  - Begin the Phase 1 sediment coring and sampling event in September.
  - Submit validated groundwater data to EPA.
  - Receive data and initiate data validation for the riverbank sampling event.

- e) Information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Arkema RD Work, and a description of efforts made to mitigate those delays or anticipated delays:
  - The Phase I PDI work in accordance with the EPA-approved PDI work plan is approximately 10–15 percent completed.
  - No delays were encountered that are anticipated to affect the future schedule for implementation at this time.
- f) List of any modifications to the work plans or other schedules that Respondent Arkema has proposed or that have been approved by EPA:
  - No field change request forms were completed during this quarter.
- g) List of all activities undertaken in support of the CIP during the reporting period and those to be undertaken in the next quarter:
  - LSS and its Community Involvement Coordinator were invited by EPA and Triangle to attend a “Listen and Learn” about the Portland Harbor Collaborative Group. That meeting took place on July 13, 2021.

Please contact me at (503) 943-3614 or Mike Pinto at (484) 437-1991 if you have any questions or comments pertaining to this progress report.

Sincerely,



Eron Dodak, R.G.  
Senior Consultant